

Deadline: April 12, 2006



COUNTY OF SISKIYOU

Board of Supervisors

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April 4, 2006

State Water Resources Control Board 1001 I Street Sacramento, CA 95814

Re: Comment Letter - Sediment and Temperature TMDL in Scott River Watershed

For many decades, landowners in the Scott River Watershed have voluntarily participated in various conservation efforts. (For instance, the award-winning French Creek Watershed Council has demonstrated success in the collaborative reduction of sediment sources.) The Siskiyou Resource Conservation District (RCD) is recognized as a leader in the State for its proposed innovative programmatic approach toward an incidental take permit for threatened coho salmon and a watershed-wide 1602 streambed alteration agreement. The CA Department of Fish and game has recognized local knowledge and efforts by creating the Shasta and Scott Coho Recovery Team, separate from other State recovery efforts. The Siskiyou County Public Works Department has been recognized for its award-winning progressive work on fish barrier culvert replacement. When the North Coast Regional Water Quality Control Board gave approval to its proposed Amendment and Action Plan for the Scott River TMDL, it is not surprising that these folks would roll up their sleeves and get to work.

The Siskiyou County Department of Public Works is already informally following the practices described in the 5 County Road Maintenance Manual. In addition, the County was recently successful in acquiring a grant from the Department of Fish and Game through the 5 Counties Coalition for road inventory work in the Scott Valley. Work is scheduled to commence this year and a final project report is scheduled for completion by April 2008.

The Siskiyou County Planning Department, working with a consultant, is well on its way in producing a draft Land Development Manual. Expectations are that the manual will be out for CEQA hearings and comment this coming summer.

Siskiyou County has jurisdiction over groundwater management within the county. It currently regulates the extraction of groundwater for use outside the basin from which it was extracted under County code, Title 3. Public Safety, Chapter 13. Groundwater. Recently, the Siskiyou County Board of Supervisors gave its blessing to a local Community Groundwater Measuring Program (CGMP) in Scott Valley intended to further develop community support for future groundwater studies — a collaborative effort of the Scott River Watershed Council, Natural Resource Conservation Service (NRCS,) University of California, Cooperative Extension (UCCE) — Davis and the Siskiyou RCD.

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The CGMP will measure the "static water levels," (depth of groundwater from a fixed point on the surface,) of wells that are not in use at the time of measurement. The objective of this study will be to characterize monthly fluctuations in the Scott Valley water table over an extended period of time (at least 5-10 years.) This will be a first step to establish "baseline" data and answer such questions as: (1) What is the relationship of groundwater storage to discharge and recharge?; (2) Is there evidence of multiple aquifer layers?; (3) What is the seasonal variation in groundwater levels?; and (4) Are there any trends?

Historically, there is only basic information on groundwater from the studies done by Seymour Mack in the 1950s and the Department of Water Resources (DWR) in establishing lines of interconnected groundwater with surface waters for the Scott River Water Rights Adjudication. The baseline data derived from the program should contribute significantly to knowledge of how groundwater moves through the Scott River system. The community then hopes to answer additional questions through hypothesis testing using more formal studies.

The initial CGMP will sample from a monitoring grid of at least 30 wells to cover most of the valley. It is hoped that this will be expanded over time to include tributary valleys to the mainstem Scott. Collection of monthly measurements will be done by the Siskiyou RCD and SRWC starting in April. NRCS will contribute the technical and training component of the project. UCCE Davis will receive the data and store it in a form that can be used for future analysis and modeling. There is currently sufficient funding through a U.S. Fish and Wildlife Service grant to the Siskiyou RCD to get through the first year of data collection. The RCD will be seeking additional funds and partners to ensure the future of the study program and analysis by UCCE. Siskiyou County will also be involved to insure that studies and future steps are appropriately and professionally accomplished.

The Siskiyou County Board of Supervisors commends the North Coast Regional Water Quality Control Board for acknowledging the high degree of collaborative relationships established in the Scott Valley Watershed, devising an approach that takes advantage of these long-standing relationships, as well as recognizing the timely opportunity for working within the programmatic ITP process to cooperatively achieve water quality goals.

The Board of Supervisors recommends that the SWRCB support the aforementioned elements of the proposed Amendment Action Plan.

Sincerely,

Marcia H. Armstrong, Chair

Siskiyou County Board of Supervisors